

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE: Chinelle Monique Ballard</b> <b>Debtor</b>  <b>MIDFIRST BANK</b> <b>Movant</b>  vs.  <b>Chinelle Monique Ballard</b> <b>Kenneth E. West, Trustee</b>	<b>BK NO. 23-13491 MDC</b>  <b>Chapter 13</b>  <b>Hearing Date: 02/29/24</b>
	<b>Respondents</b>

**OBJECTION OF MIDFIRST BANK TO CONFIRMATION OF CHAPTER 13 PLAN**

MIDFIRST BANK (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. The claims bar date is January 25, 2024. Secured Creditor intends to file a claim on or before the bar date with pre-petition arrears estimated at \$42,463.16.
2. Debtor's Plan provides for payment in the amount of \$40,023.65 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$2,439.51 and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, MIDFIRST BANK, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: January 10, 2024

By: /s/Denise Carlon  
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